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United States Attorney Southern District of New York

86 Chambers Street New York, New York 10007

September 3, 2020

VIA ECF

Honorable Lewis J. Liman United States District Judge United States District Court 40 Foley Square New York, NY 10007

Re: Shahabuddin v. United States of America, 19 Civ. 10716 (LL)

Dear Judge Liman:

I represent the United States of America, the defendant in the above-referenced tax refund case. I write respectfully on behalf of both parties to request a stay of the remaining discovery deadlines in this case while the parties attempt to negotiate a settlement of this case.

Pursuant to the Court's scheduling order dated July 29, 2020, fact discovery ends on September 8, 2020, and expert discovery ends on October 23, 2020. Dkt. No. 24. The parties have continued to make progress but have not yet completed fact discovery in this case. Additionally, a few weeks ago, the parties commenced settlement negotiations. Rather than request an extension of the discovery deadlines at this time, the parties respectfully request that the Court stay discovery to allow the parties to focus their efforts on settlement and that the parties submit a joint status letter by October 5, 2020, to update the Court on their efforts.

I thank the Court for its consideration of this request.

Respectfully,

AUDREY STRAUSS
Acting United States Attorney for the
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By: /s/ Jennifer Jude

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cc: Counsel for Plaintiff (by ECF)

GRANTED IN PART. This case is stayed for thirty (30) days from the date of this Order, until October 12, 2020. The parties shall submit a joint letter by October 5, 2020.

SO ORDERED. 9/11/2020.

LEWIS J. LIMAN United States District Judge